

DEPARTMENT OF SOCIAL SERVICES

May 23, 2001

ALL- COUNTY INFORMATION NOTICE I-40-01

TO: ALL COUNTY WELFARE DIRECTORS
WELFARE-TO-WORK COORDINATORS

REASON FOR THIS TRANSMITTAL

- ☐ State Law Change
- ☐ Federal Law or Regulation Change
- ☐ Court Order
- ☐ Clarification Requested by One or More Counties
- ☒ Initiated by CDSS

SUBJECT: REPORT TO THE LEGISLATURE ON GOOD CAUSE ESTABLISHMENT, COMPLIANCE AND CURING OF SANCTIONS UNDER THE CalWORKs PROGRAM

The purpose of this notice is to provide a copy of the attached report, "Good Cause Establishment, Compliance and Curing of Sanctions under the CalWORKs Program." Fiscal Year 2000/01 Budget Act language required the California Department of Social Services (CDSS) to report to the Legislature on the rates of good cause establishment and curing of sanctions in the California Work Opportunity and Responsibility to Kids (CalWORKs) Welfare-to-Work program. The legislative language also required that CDSS include recommendations for improving these current processes.

The report contains informative survey data obtained from counties and legal advocates. Thank you for your county participation and valued input to the survey. Your responses and recommendations contributed greatly to the completion of this report to the Legislature.

As recommended in the report, CDSS plans to convene a workgroup of county and state staff, and legal advocates to address the issues identified in the report. CDSS anticipates that this workgroup will be convened sometime in the summer. Further details will be provided once the workgroup representatives have been identified and the plans finalized. We encourage you to review the report and hope that it will serve as a useful tool as we work together to develop strategies to improve services to participants in the CalWORKs program.

If you have any questions, please do not hesitate to contact Karen Kennedy at (916) 657-3400.

Sincerely,

Original Signed By
Charr Lee Metsker on
05/22/01

CHARR LEE METSKER, Chief
Employment and Eligibility Branch

Attachment

c: CWDA
CSAC

REPORT TO THE LEGISLATURE
ON
GOOD CAUSE ESTABLISHMENT, COMPLIANCE AND CURING
OF SANCTIONS UNDER THE CalWORKs PROGRAM

April 1, 2001

STATE OF CALIFORNIA
Gray Davis, Governor

HEALTH AND HUMAN SERVICES AGENCY
Grantland Johnson, Secretary

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES
Rita Saenz, Director

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EXECUTIVE SUMMARY

SUBJECT

This report presents findings and recommendations on rates of good cause establishment, the compliance process, and curing of sanctions in the CalWORKs Welfare-to-Work (WTW) program.

PRINCIPAL FINDINGS AND RECOMMENDATIONS

Some evidence, based on input from counties and legal advocates, suggests that improvements should be made to the good cause, compliance, and sanction processes. However, there was not agreement on the direction those improvements should take.

The California Department of Social Services (CDSS) recommends taking the following measures, in consultation with legal advocates and counties:

- Convene a County/State/Advocate workgroup to:
 - Determine the most effective methods for establishing good cause and to recommend improvements to the compliance and sanction process. This would allow the Department to consider a wider variety of alternatives for improvement than was considered in the survey.
 - Review the Notices of Action (NOAs) related to sanctions to determine if changes are necessary that would improve communication between the non-compliant individual and the county.
 - Reiterate proper sanction procedures via an All County Letter and provide counties with the revised sanction NOAs to facilitate the establishment of good cause, the fulfillment of compliance plans, and the sanction of non-compliant recipients. This would allow the Department to develop a strategy to enhance the Welfare-to-Work recipient's opportunity to more effectively communicate his or her needs to the case manager.

In addition, CDSS continues to work with the counties and legal advocates in many areas to determine the most effective methods for establishing good cause and to improve the compliance and sanction process to encourage individuals to participate in WTW activities. CDSS is working with a number of research groups to further study the good cause establishment, compliance processes, and sanction. The Welfare Policy Research Project has commissioned a comprehensive study of the CalWORKs sanction process in California as it relates to individuals who fail to comply, without good cause, with Welfare-to-Work requirements. The study, which is expected to be completed by the end of 2001, will address a number of research questions including the frequency of the use of sanctions and their impact on CalWORKs participants. CDSS, in collaboration with UCLA, RAND and others, is conducting additional research on CalWORKs sanctions to identify issues and any trends in the sanction process.

California Department of Social Services
Good Cause Establishment, Compliance and Curing Of Sanctions Under The
CalWORKs Program

INTRODUCTION

PURPOSE

Fiscal Year 2000/01 Budget Act language requires the California Department of Social Services (CDSS) to report, no later than April 1, 2001, on the rates of good cause establishment and curing of sanctions in the California Work Opportunity and Responsibility to Kids (CalWORKs) Welfare-to-Work (WTW) program. The legislative language also requires the report to include recommendations for improving these current processes.

BACKGROUND

The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA, P.L. 104-193) fundamentally changed the American welfare system, replacing the Aid to Families with Dependent Children (AFDC) program with the Temporary Assistance for Needy Families (TANF) program. The TANF program is a block grant program that gives individual states unprecedented flexibility to design their welfare programs to move individuals from welfare to self-sustaining employment. The federal TANF law directs states to sanction clients for failure to participate in work activities and non-cooperation with child support enforcement efforts as spelled out and agreed to in a "personal responsibility agreement" between the client and the agency staff. States also may sanction recipients who fail to follow other guidelines, such as child immunization and school attendance requirements.¹ States that do not sanction non-compliant individuals are subject to a federal financial penalty of no more than five percent of the state's block grant funds.²

While the federal law limits a state's ability to sanction by prohibiting them from penalizing a single parent with a child under age six if childcare is not available, it also gives states a great deal of flexibility to determine the sanction structure (what constitutes non-compliance, the severity of the sanction, and the appeals process to restore benefits), as well as how sanctions are administered. The three primary types of sanctions utilized by states are: 1) adult-only – the benefit for the non-compliant adult is reduced or eliminated for the length of time; 2) full-family – the benefit for the entire family is eliminated (or sometimes reduced); and 3) pay for performance – the amount of the penalty reduction is directly tied to the amount of hours that the non-compliant adult fails to work.³ Unlike thirty-seven other states that chose full-family sanctions⁴, California chose to sanction

¹ PRWORA Section 408(a) and (b), "Prohibitions and Requirements," pp. 32-39.

² PRWORA Section 409(a)(5), "Penalties: Failure to Comply with Paternity Establishment and Child Support Enforcement Requirements under Part D," 1996.

³ Welfare Information Network (WIN) Issue Notes, "The Use of Sanctions Under TANF," Vol.3.No.3, April 1999.

⁴ Timing of Full-Family Sanctions from the State Policy Documentation Project – A joint project of the Center for Law and Social Policy and the Center On Budget and Policy Priorities, April 2000.

recipients by cutting only the adult portion of the grant to provide a safety net for children.

A sanction occurs when an individual is taken out of the assistance unit (AU) for failure, without good cause, to comply with the program requirements. Non-compliance is the failure or refusal to comply with the program requirements, e.g., to sign a Welfare-to-Work plan; participate in any assigned program activity, including a self-initiated program; provide required proof of satisfactory progress in any assigned program activity; meet work requirements; or accept employment. For purposes of this report, the findings and discussion refer primarily to sanctions that are imposed for the failure to comply with Welfare-to-Work requirements.

When a CalWORKs Welfare-to-Work sanction is imposed, the sanctioned adult also loses food stamps eligibility, unless he or she meets certain food stamp work exemptions, e.g., care of a dependent child under six years of age, participation in a drug or alcohol treatment and rehabilitation program, etc.⁵ Although California has the option to terminate a client's Medi-Cal assistance, the state continues to provide medical assistance for the sanctioned adult.⁶

Under CalWORKs, adult recipients of aid, unless exempt, must participate in CalWORKs Welfare-to-Work activities and meet program requirements as a condition of receiving cash aid. Welfare-to-Work activities are services that help a recipient find and keep a job. Most adult recipients must work or participate in Welfare-to-Work activities at least 32 hours a week for one-parent families; 35 hours a week for two-parent families. After the county and the recipient agree on a Welfare-to-Work plan, adult CalWORKs recipients can receive cash aid and Welfare-to-Work services for up to 18 months or 24 months. A CalWORKs recipient may continue to receive cash aid after the 18- or 24-month time limit only if he or she is working and/or participating in community service for the required number of hours (32/35) each week.

The Welfare-to-Work requirements that must be met include signing a Welfare-to-Work plan and participating in assigned program activities. Welfare-to-Work program activities include: unsubsidized employment; subsidized private and public sector employment; self-employment; on-the-job training; job search and job readiness assistance; work study; adult basic education; secondary school education; education toward a General Education Development certificate; and community service. Participation in mental health, substance abuse and/or domestic abuse services that are necessary to obtain and retain employment, as well as participation required of the parent by the school to ensure the child's attendance, are considered countable WTW program activities in California.

5 CDSS Manual of Policies and Procedures (MPP) Section 63-407.54

6 The California Department of Health Services (DHS) All-County Letter (ACL) No.90-52, "Recall of ACWDL Instructing Counties to Deny or Discontinue AFDC Recipients Terminated Due to Failure to Participate in GAIN," June 7, 1990. State Medical Manual, Part 3 – Eligibility Section 3301.3.

METHODOLOGY

CDSS developed two surveys to collect the information necessary to complete the report to the Legislature. One survey was sent to the 19 largest counties in California, which serve approximately 90 percent of the CalWORKs caseload. This survey collected information and data regarding policies and procedures the counties have established to assist individuals experiencing difficulty participating in activities prior to entering the compliance process and any policies the counties have established to assist individuals after a sanction has been imposed. The survey also collected recommendations to change the good cause, noncompliance and sanction processes.

The second survey questioned the remaining 39 counties about recommendations to change the good cause, noncompliance and sanction processes. This survey was also sent to six legal advocacy groups to obtain a broader perspective for recommended changes.

All the 19 largest counties (100 percent) replied to the first (or larger) survey. Thirty-two (or 82 percent) of the remaining 39 counties responded to the second (or abbreviated) survey. Four (or 67percent) of the six legal advocacy groups responded to the CDSS survey. One legal advocate modified and shared the survey with additional legal advocacy organizations. As a result, twenty-three responses to the modified survey were received. Because the counties were not sent the modified survey, this report reflects only responses where both the counties and the legal advocacy groups address the same questions. This report reflects the information collected, including recommendations of both the 51 counties and the 27 legal advocacy groups responding to the CDSS survey.

In addition to the surveys, data from the CalWORKs Welfare-to-Work Monthly Activity Reports (WTW25 and WTW25A) was used to show the rate of and good cause establishment. The WTW Monthly Activity Reports capture data on the number of individuals who received cash aid and the number of individuals who were enrolled and/or participated in WTW activities during the report month. The WTW Monthly Activity Reports also provide a cumulative or running total of the number of exempt and sanctioned individuals.

GOOD CAUSE DETERMINATION

A participant is excused from participation due to good cause when the county determines that there is a condition that temporarily impairs the participant's ability to be regularly employed or to participate in Welfare-to-Work activities. The good cause criteria include: necessary supportive services are not available (e.g., child care unavailable); the participant is a victim of domestic violence and participation would be detrimental to the participant's family; the age of the individual affects his or her ability to participate in Welfare-to-Work activities; or the participant or a family member is temporarily ill or incapacitated.

Additionally, participants also have good cause for failing to work/participate if the employment/activity: discriminates in terms of age, sex, race, religion, national origin, or physical or mental incapacity; exceeds the daily or weekly hours of

work customary to the occupation; requires travel to and from employment/activity that presents a hardship on family (e.g., round-trip travel time required exceeds a total of two hours exclusive of the time necessary to transport family members to a school or place providing child care); violates applicable health and safety standards; does not provide for worker's compensation insurance; interrupts an approved education or job training program which would otherwise lead to employment at sufficient income to be self-supporting; or violates the terms of the individual's union membership.

Counties must attempt to communicate with participants to determine whether they had good cause for not attending or participating in a Welfare-to-Work activity before starting the compliance process. Once a county recognizes that good cause exists and there are issues that prevent an individual from participating in a required activity, the county takes steps to resolve the issues and remove the barriers. CalWORKs provides for the removal of certain barriers by making supportive services available to clients in order for them to participate in the program. Some county supportive services include: childcare, transportation, and ancillary expenses such as cost of books, tools, job-required clothing, and personal counseling. Additionally, counties may provide other services and programs that will help clients obtain and retain employment.

COMPLIANCE PROCESS

Upon determination that an individual has failed or refused to comply with program requirements, the county welfare department must send the individual a notice of action effective no earlier than 30 calendar days from the date of issuance. The Notice of Action informs the individual that a sanction will be imposed if the individual fails to either attend an appointment scheduled by the CWD within 20 calendar days of the notice or contact the CWD by telephone within 20 calendar days of the notice, and fails to either provide information that leads to good cause or agrees to a corrective compliance plan.

Once good cause has been established the client has 20 days to agree to comply with program requirements. If good cause cannot be established, a compliance plan will be developed and the individual will be expected to agree to the plan or a financial sanction will be imposed. If the CWD is not able to establish contact with the individual and the individual fails to contact the CWD within the 20-calendar-day period, the CWD will impose a sanction.

IMPOSITION OF SANCTIONS

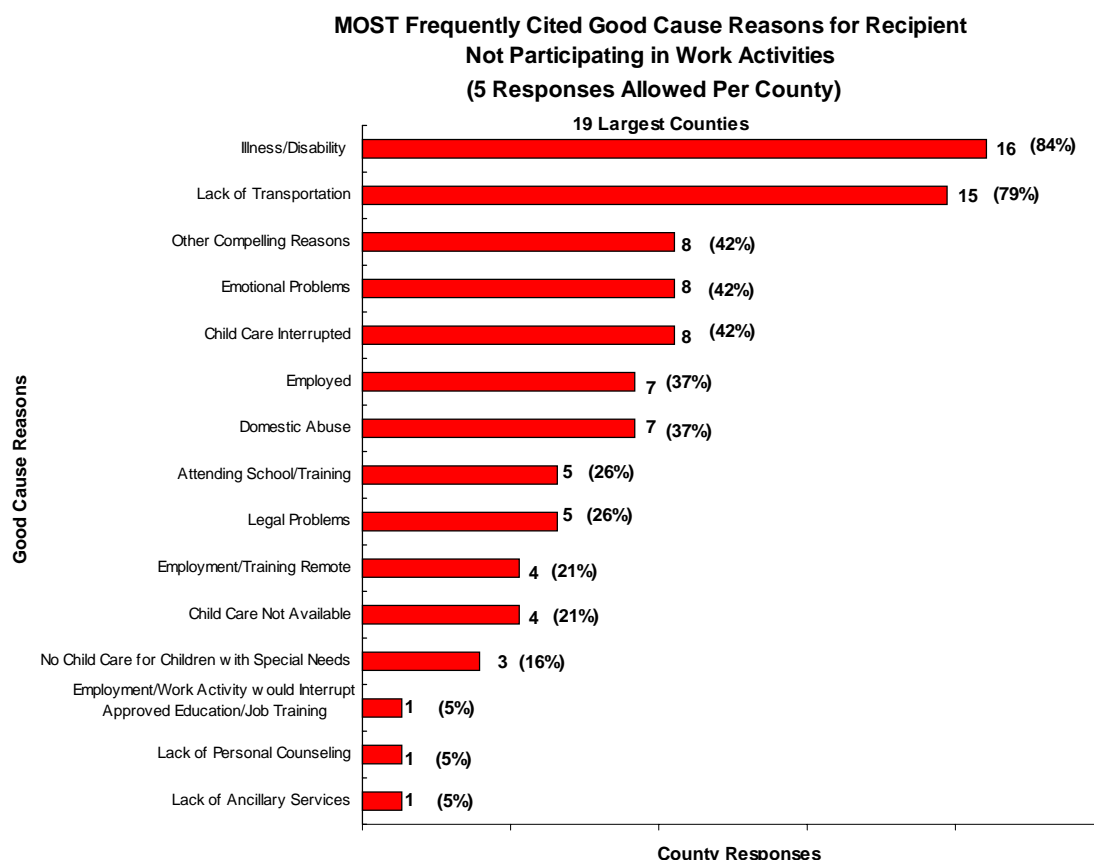
When a sanction is imposed, the individual often contacts the county and reveals a problem, such as illness or lack of transportation as a reason for nonparticipation. Once the county receives this information from the individual, the county is able to take the necessary steps to resolve the issue and the sanction is rescinded. A first instance of noncompliance can be cured at any time. A second instance of noncompliance results in a sanction being imposed for a minimum of three months or until the sanction is cured, whichever is longer. A third and any subsequent instance of noncompliance results in a sanction being imposed for a minimum of six months or until cured, whichever is longer. Once a sanction is cured, the individual is reinstated to the Assistance Unit as long as he or she is otherwise eligible.

FINDINGS

The following are the surveyed responses of the counties and legal advocate groups regarding good cause, compliance and sanction policies and recommendations. Each section is followed by recommendations offered by those surveyed.

GOOD CAUSE

The 19 largest counties were asked to list their five most frequently cited good cause reasons for failure to participate in WTW activities. The number one good cause reason cited by sixteen (or 84 percent) of the counties was illness or disability of self or family member. The second most frequently cited good cause reason cited by fifteen (or 79 percent) of the counties was lack of transportation. The third, fourth, and fifth most cited good cause reasons were child care interrupted, emotional problems, or “other” as common good cause reasons. Additionally, under the category “Other Compelling Reasons”, of note, four counties listed “homelessness” as a frequently cited good cause reason for a client not participating in WTW activities. Although, “Employed” is not a good cause reason for not participating in WTW activities, seven counties indicated this as a reason individuals did not participate in activities. In this instance, the Welfare-to-Work participants had failed to communicate with the CWD that they were unable to make scheduled appointments or participate in scheduled WTW activities due to employment. Seven counties also cited domestic abuse as a good cause reason.



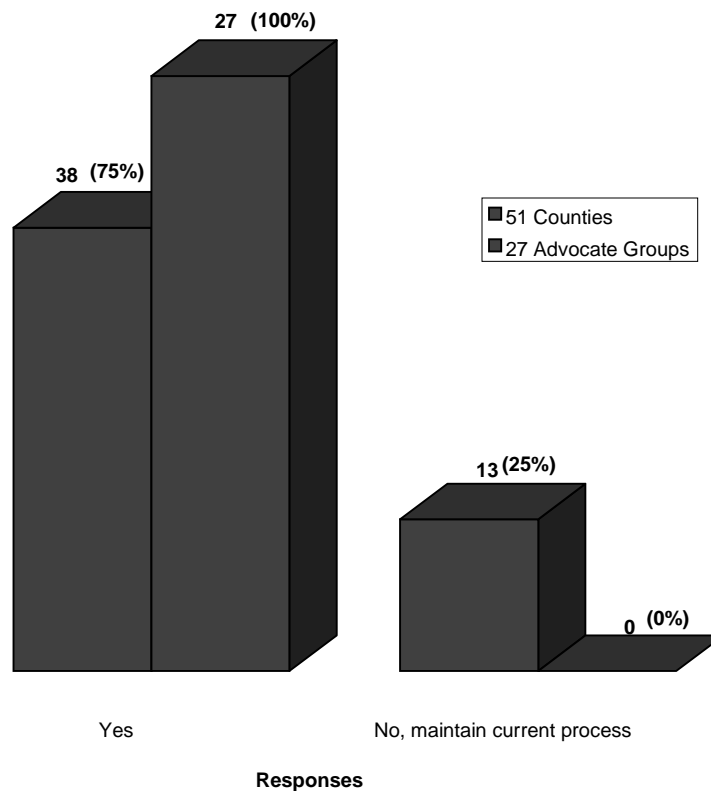
GOOD CAUSE ESTABLISHMENT RATE

For the period July 1999 through September 2000, the statewide average number of monthly enrollees in the 19 largest counties' Welfare-to-Work programs was 299,456. For the same period, the average monthly number of participants granted good cause for temporarily not participating in Welfare-to-Work activities was 9,137. The collected data indicates a three percent rate of good cause establishment for this period of time. However, this rate does not recognize those recipients who properly and promptly notify their case manager of a participation problem. In these instances, the individual communicates the problem to the caseworker and it's solved before there is a need to determine good cause.

GOOD CAUSE RECOMMENDATIONS

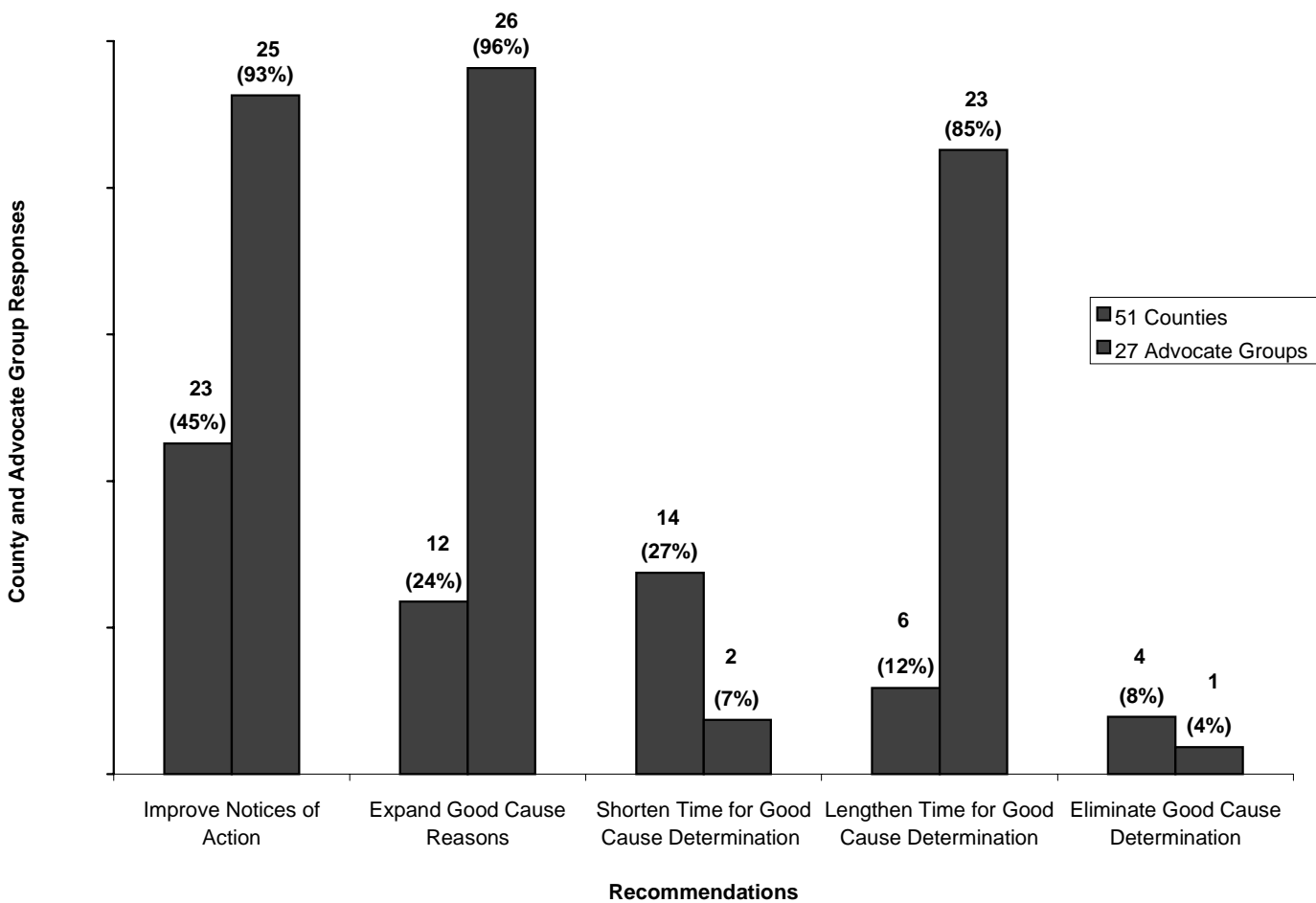
Of the 51 counties responding to the portion of the survey about recommendations, thirty-eight counties (or 75 percent) suggested that improvements are needed to the current process of good cause establishment. All 27 of the legal advocates who responded to the survey agree that changes need to be made to the methods currently used to establish good cause.

Counties and Advocate Groups Indicating Good Cause Determination Improvements are Needed.



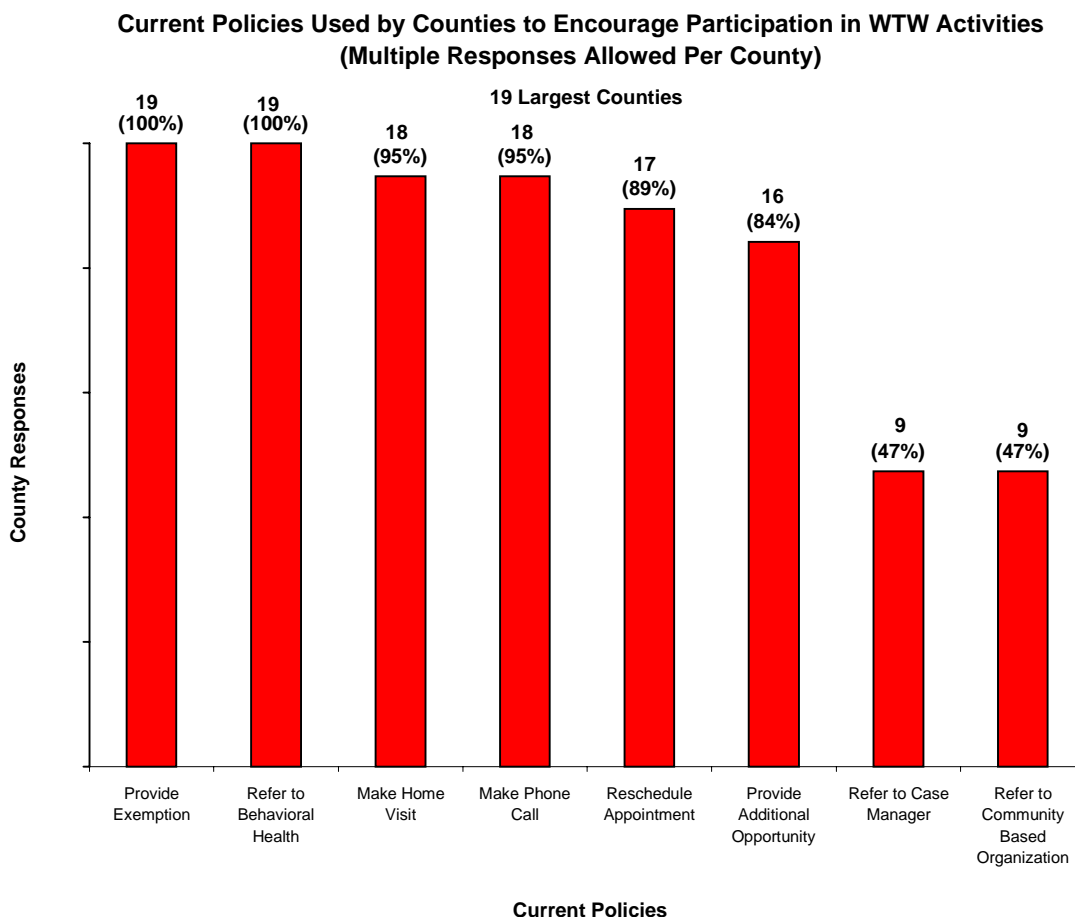
Twenty-five (or 93 percent) of the legal advocates and 23 (or 45 percent) of the counties responding believe that the good cause Notice of Action needs to be improved. Twelve (or 24 percent) of the 51 counties and twenty-six (or 96 percent) of the legal advocates recommend expanding the reasons for granting good cause. When considering good cause recommendations, the greatest difference of opinion between the counties and the legal advocates lies in the length of time participants should be allowed to establish good cause. Counties and legal advocates do not agree on whether to shorten or lengthen the time needed to establish good cause. However, the counties and the legal advocates do agree that the elimination of the good cause determination would not be of value.

Recommendations for Improving Good Cause Determinations



COMPLIANCE

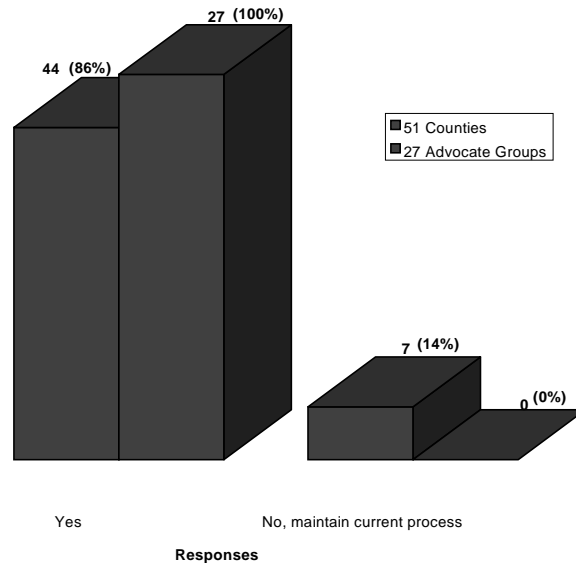
Of the 19 largest counties surveyed, all reported policies in place to work with and encourage those individuals who are experiencing difficulties to continue to participate in Welfare-to-Work activities prior to the beginning of the compliance process. All 19 counties stated that, when it is called for, they exempt and/or refer recipients to behavioral health services. Eighteen (or 95 percent) of the counties reported that they use phone calls and home visits to encourage recipients to comply with Welfare-to-Work requirements. Seventeen (or 89 percent) of the counties reported they reschedule appointments to give individuals another opportunity to participate. Sixteen (or 84 percent) of the counties provide additional opportunities to meet with their Welfare-to-Work clients. In addition, nearly half (47 percent) of the counties find it necessary to refer clients to a case manager and/or refer them to a community-based organization for additional services designed to assist the individual in participating in Welfare-to-Work activities.



COMPLIANCE RECOMMENDATIONS

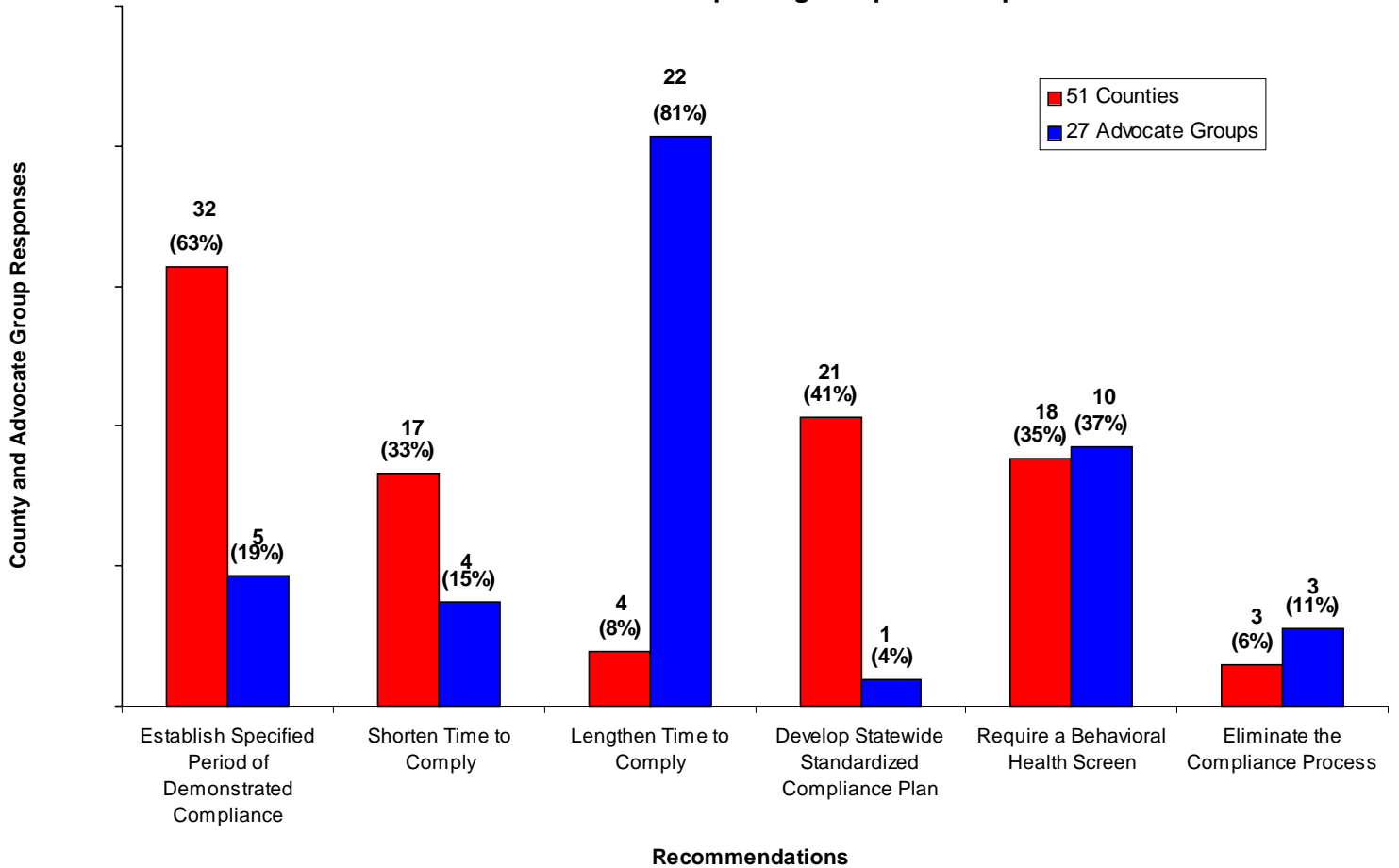
Of the 51 counties and the 27 legal advocate groups responding to the portion of the survey about recommendations, 44 counties (or 86 percent) and 27 legal advocate (or 100 percent) agree that the compliance process is in need of improvement.

Counties and Advocate Groups Indicating Compliance Improvements are Needed



Thirty-two (or 63 percent) of the counties surveyed indicated that CalWORKs participants should comply for a specified length of time before the compliance process is considered completed. Only five (or 19 percent) of the legal advocates surveyed agreed with the recommendation to require a participant to demonstrate compliance for a specified period of time. When considering the compliance recommendations, the greatest difference of opinion between the counties and the legal advocates lies in the period of time for compliance. Counties and legal advocates do not agree on whether to shorten or lengthen the compliance period. From the counties' perspective, a standardized compliance plan is desirable; 21 counties (or 41 percent) recommended a statewide, standardized compliance plan. Only one legal advocate recommended a standardized compliance plan to improve the compliance process. Of the counties and legal advocates responding to the survey, eighteen (or 35 percent) and ten (or 37 percent) respectively, agreed that a behavioral health screen should be required. Only three (or six percent) of the counties and three (or 11 percent) of the legal advocates surveyed suggested elimination of the compliance process.

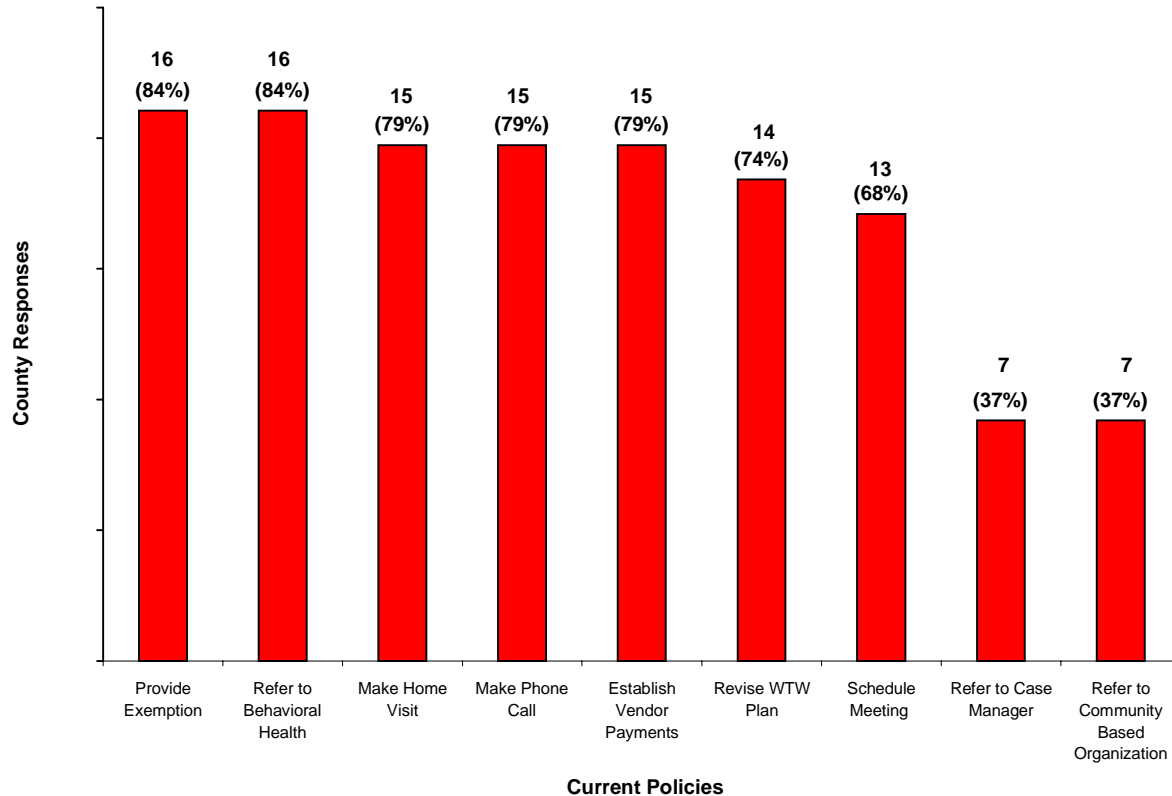
Recommendations for Improving Recipient Compliance



CURING OF SANCTIONS

Sixteen (or 84 percent) of the 19 largest counties reported they seek to exempt or refer clients to behavioral health services. Fifteen (or 79 percent) of the counties use home visits, phone calls, and the establishment of vendor payments to encourage participants to cure sanctions. Fourteen (or 74 percent) of the counties work with the client to revise the WTW plan to encourage participation and thirteen (or 68 percent) counties schedule meetings with the sanctioned individuals to discuss the Welfare-to-Work plan. Seven (or 37 percent) of the counties refer the individual to a specialized case manager or to a community based organization. Other counties specified services, such as providing sanction orientations on a regular basis or sending notices to sanctioned individuals inviting them to cure their sanctions.

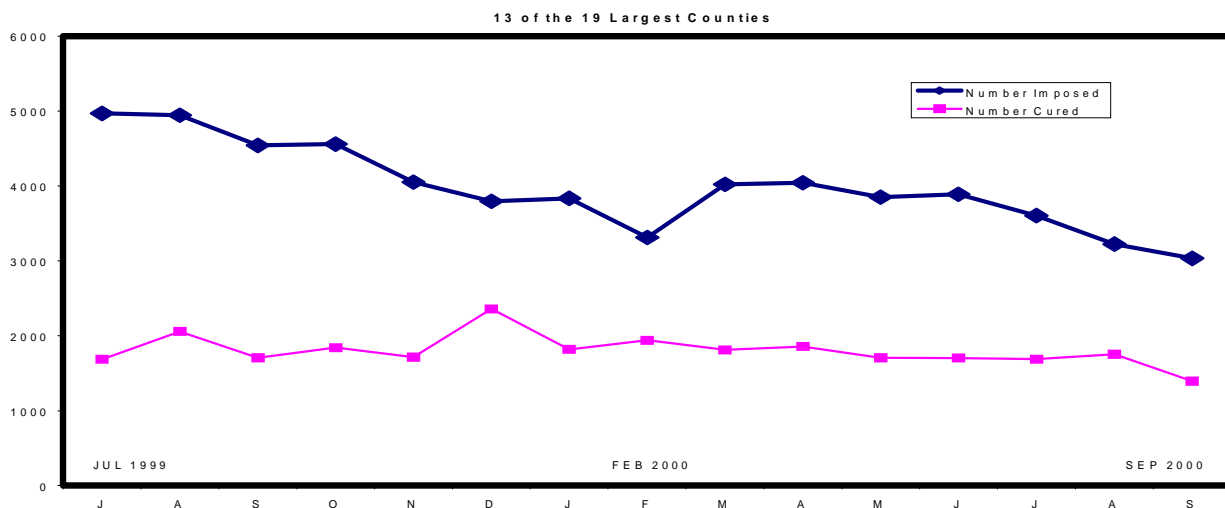
**Current Policies Used by Counties to Encourage Individuals to Cure Sanction
(Multiple Responses Allowed Per County)
19 Largest Counties**



IMPOSING AND CURING SANCTIONS

Six of the 19 largest counties were unable to provide complete data on the number of imposed sanctions or the number of sanctions cured for the period July 1999 through September 2000. For the thirteen remaining counties that did report this data, the average monthly CalWORKs caseload was 416,074 adults. For the same period, the average monthly number of new sanctions imposed for the thirteen counties was 3,978 and the average monthly number of cured sanctions was 1,803. Based on the thirteen counties reporting, the sanction cure rate for that period of time was 45 percent.

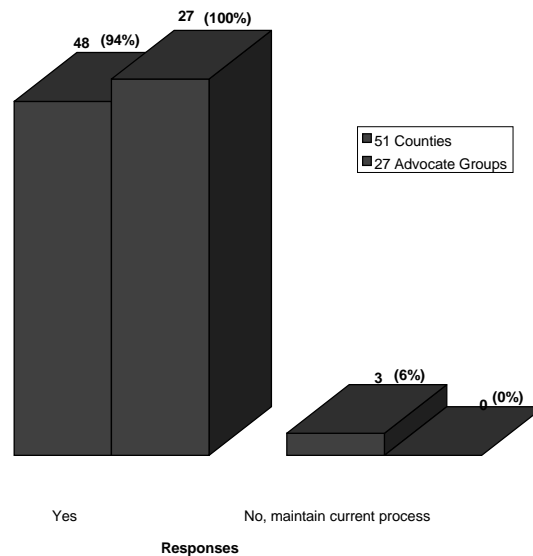
**Number of New Sanctions Imposed and Sanctions Cured Each Month
for the Period July 1999 through September 2000**



SANCTION RECOMMENDATIONS

Forty-eight (or 94 percent) of the counties that reported and 100 percent of the legal advocacy groups indicate a need for improvement in the area of sanctions.

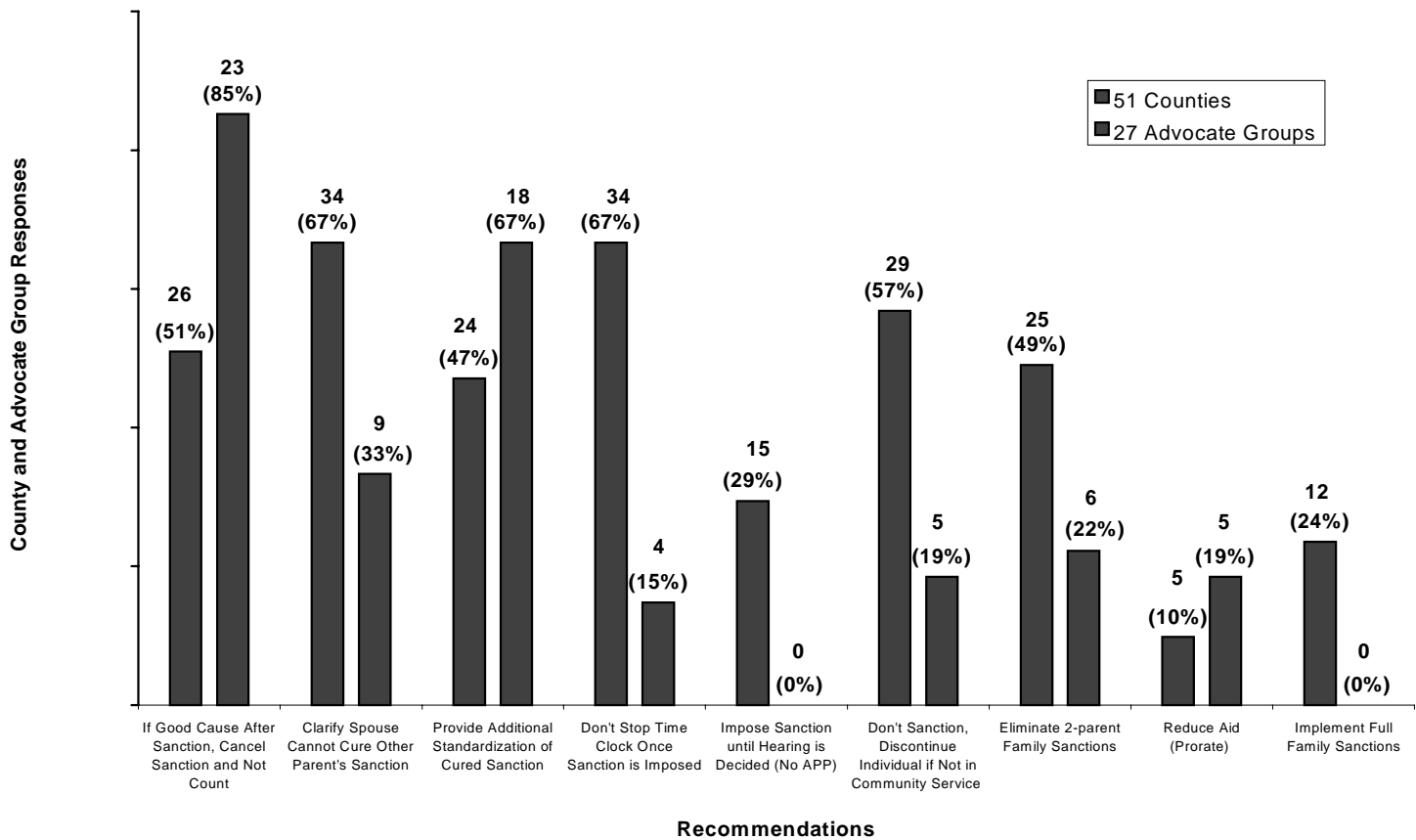
Counties and Advocate Groups Indicating Sanction Improvements are Needed



Twenty-six (or 51 percent) of the counties and twenty-three (or 85 percent) of the legal advocate groups feel that if good cause is determined after a sanction has been imposed, the sanction should be canceled and not count as an instance. While this is current practice, the policy may need clarification. Thirty-four (or 67 percent) of the counties and nine (or 33 percent) of the legal advocates believe that improvement is needed to clarify that a spouse cannot act on behalf of the other parent's sanction in order to cure that sanction. Twenty-four (or 47 percent) of the counties and eighteen (or 67 percent) of the legal advocates expressed a need to provide additional standardization of what constitutes a cured sanction. Thirty-four (or 67 percent) of the counties recommended that once the sanction is imposed the CalWORKs time clock should not be stopped. Only four (or 15 percent) of the legal advocates agree with the position that once the sanction is imposed the CalWORKs time clock should not be stopped. Fifteen (or 29 percent) of the counties indicated that sanctions be imposed until the fair hearing is decided. No legal advocates recommended that the counties impose sanctions until the fair hearing is decided. Twenty-nine (or 57 percent) of the counties and five (or 19 percent) of the legal advocates indicated that counties should not sanction, but discontinue a recipient if they do not participate in community service. Twenty-five (or 49 percent) of the counties and six (or 22 percent) of the legal advocates suggested that the two-parent family sanction should be eliminated and both parents required to participate to enhance their potential for self-sufficiency.

Five (or ten percent) of the counties and five (or 19 percent) of the legal advocate groups indicated that aid to the WTW participant should be reduced (prorated) for failure to comply with Welfare-to-Work requirements. Twelve (or 24 percent) of the counties recommended that full family sanctions be implemented. No legal advocate group surveyed recommended implementation of a full family sanction.

Recommendations for Improving the Sanction Process



RECOMMENDATIONS

CDSS believes that participation in Welfare-to-Work activities is a responsibility shared by both the CalWORKs recipient and the county. Communicating promptly and accurately is part of that responsibility. While there is agreement among those surveyed that improvements should be made to the good cause, compliance and sanction processes, often there was not agreement on the direction those improvements should take. Some of the recommendations identified in this report can be implemented administratively and would improve the communication between the recipient and the case manager without legislative changes. However, many of the changes would require modifications to the CalWORKs statute prior to implementation. In an effort to improve the compliance and sanction process, CDSS shall:

- Convene a workgroup of counties and legal advocates to:
 - Determine the most effective methods for establishing good cause and to improve the compliance and sanction process. This could include additional means of communication, such as forms that would permit recipients to inform the county of problems they are experiencing.
 - Review the Notices of Action related to sanctions to determine if changes are necessary to improve communication with the non-compliant individual. If changes are necessary, develop alternative language for CDSS consideration.
 - Explore a wider variety of alternatives to improve the good cause, compliance and/or sanction process than was considered in this survey, which may include legislative changes.
- Reiterate proper sanction procedures via a ACIN and provide counties with any revised sanction NOAs to facilitate the establishment of good cause, the fulfillment of compliance plans, and the sanction of non-compliant recipients.

In addition, CDSS continues to work with the counties and legal advocates in many areas to determine the most effective methods for establishing good cause and to improve the compliance and sanction process to encourage individuals to participate in WTW activities. CDSS is working with a number of research groups to further study the good cause establishment, compliance processes, and sanction. The Welfare Policy Research Project has commissioned a comprehensive study of the CalWORKs sanction process in California as it relates to individuals who fail to comply, without good cause, with Welfare-to-Work requirements. The study, which is expected to be completed by the end of 2001, will address a number of research questions including the frequency of the use of sanctions and their impact on CalWORKs participants. CDSS, in collaboration with UCLA, RAND and others is conducting additional research on CalWORKs sanctions to identify issues and any trends in the sanction process.